

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CORPORAL TRINIDAD NAVARRO,	:	
	:	
Plaintiff,	:	C.A. No. 05-565 GMS
	:	
v.	:	JURY TRIAL DEMANDED
	:	
CHRISTOPHER A. COONS,	:	
individually and in his official capacity;	:	
GUY H. SAPP, individually and in his	:	
official capacity; and NEW CASTLE	:	
COUNTY, a municipal corporation,	:	
	:	
Defendants.	:	

**NOTICE OF RE-DEPOSITION OF PLAINTIFF, TRINIDAD NAVARRO**

TO: Jeffrey K. Martin, Esquire  
Margolis and Edelstien  
1509 Gilpin Avenue  
Wilmington, DE 19806

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their undersigned attorneys will take the deposition of Plaintiff Trinidad Navarro on Wednesday, March 28 2007 at 8:00 a.m. at the New Castle County Law Department located at the New Castle County Government Center, 87 Reads Way, New Castle, DE 19720. The deposition shall continue thereafter until terminated by counsel for the Defendants. The deposition will be recorded stenographically and/or videographically and/or audiographically, before a Notary Public

or other officer authorized to administer oaths in Delaware, and will be for the purpose of discovery of evidence and for use at trial.

NEW CASTLE COUNTY LAW DEPARTMENT

/s/ Michele D. Allen  
Michele D. Allen, Assistant County Attorney  
(DE Bar I.D. #4359)  
Megan Sanfrancesco, First Assistant County Attorney  
(DE Bar I.D. #3801)  
Judith A. Hildick, First Assistant County Attorney  
(DE Bar I.D. #3244)  
Gregg E. Wilson, County Attorney  
(DE Bar I.D. #85)  
87 Reads Way, New Castle, DE 19720  
Tel: (302)395-5130

And

/s/ Jeffrey S. Goddess  
Jeffrey S. Goddess, Esquire  
Rosenthal, Monhait, Gross & Goddess, P.A.  
Suite 1401, 919 Market Street  
P.O. Box 1070  
Wilmington, DE 19899-1070

*Attorneys for Defendants*

DATED: March 14, 2007

cc: Wilcox & Fetzer

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COUNTY, a municipal corporation,	:	
	:	
Defendants.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of March, 2007, the foregoing Notice of Deposition of Plaintiff Trinidad Navarro was delivered via electronic filing and U.S. First Class Mail, postage prepaid to counsel listed below:

Jeffrey K. Martin, Esquire  
Margolis and Edelstien  
1509 Gilpin Avenue  
Wilmington, DE 19806

/s/ Michele D. Allen  
Michele D. Allen, Assistant County Attorney  
(DE Bar I.D. #4359)  
Assistant County Attorney  
New Castle County – Office of Law  
87 Reads Way  
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